

## **EXHIBIT D**

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

IPA TECHNOLOGIES INC.,

Plaintiff,

v.

AMAZON.COM, INC., and AMAZON  
DIGITAL SERVICES LLC,

Defendants.

C.A. No. 1:16-cv-1266-RGA

**PLAINTIFF IPA TECHNOLOGIES INC.'S  
NOTICE OF REDUCTION OF ASSERTED CLAIMS**

Pursuant to the Court's orders during the discovery conference held on July 24, 2020, Plaintiff IPA Technologies Inc. ("IPA") hereby provides notice of its reduction of asserted claims against Defendants Amazon.com, Inc. and Amazon Digital Services LLC (collectively "Amazon"). IPA hereby narrows the claims asserted against Amazon in this matter to the following:

1. U.S. Patent No. 6,851,115: Claims 1, 5, 6, 7, 10, 11, 15, 29, 34, 35, 38, 61, 62, 64, 69, 71;
2. U.S. Patent No. 7,069,560: Claims 1, 20, 22, 26, 28, 29, 34, 45, 50; and
3. U.S. Patent No. 7,036,128: Claims 23, 24, 25, 26, 40.

IPA previously served infringement contentions for the above-identified claims.

Dated: August 7, 2020

BAYARD, P.A.

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